

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

**Affirmation in Support of  
Application for Order of Continuance**

KONSTANTIN IGNATOV,

**19 Mag. 2258**

*Defendant.*

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State of New York )  
County of New York : ss.:  
Southern District of New York )

Christopher J. DiMase, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Geoffrey S. Berman, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. §3161(h)(7)(A).

2. The defendant was charged in a complaint dated March 6, 2019, with a violation of Title 18, United States Code, Section 1349, and was arrested in the Central District of California on the same date. The defendant was presented in the Central District of California before Magistrate Judge Gail J. Standish on March 7, 2019, and was ordered detained and removed to the Southern District of New York.

3. On March 27, 2019, the defendant appeared in the Southern District of New York and was presented before Magistrate Judge Katharine H. Parker. The defendant was represented by Jeffrey Lichtman, Esq. Judge Parker ordered that the defendant's detention be continued.


4. At the initial presentment in the Southern District of New York, Mr. Lichtman consented to a waiver of his client's right pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure to a preliminary hearing within 14 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until April 26, 2019, within which to file an indictment or information.

5. Defense counsel and I have had discussions regarding a possible disposition of this case continuing to as recently as April 22, 2019. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under the Speedy Trial Act expires on April 26, 2019.

6. Therefore, the Government is requesting a 30-day continuance until May 27, 2019. On April 22, 2019, I communicated directly with Mr. Lichtman, who specifically consented to this request, and who has advised me that he has spoken to his client who has also specifically consented to this request.

7. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York  
April 24, 2019

  
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Christopher J. DiMase  
Assistant United States Attorney  
(212) 637-2433